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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
SAN DIEGO DIVISION**

**GABRIEL TECHNOLOGIES
CORPORATION and TRACE
TECHNOLOGIES, LLC,**

Plaintiffs,

vs.

**QUALCOMM INCORPORATED,
SNAPTRACK, INC., and NORMAN
KRASNER,**

Defendants.

CIVIL ACTION NO. 3:08-cv-01992-AJB-MDD

**PLAINTIFFS' MEMORANDUM OF POINTS
AND AUTHORITIES IN SUPPORT OF
THEIR MOTION TO FILE CERTAIN
DOCUMENTS UNDER SEAL**

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1 **PROCEDURAL BACKGROUND**

2 Plaintiffs refer the Court to Defendants' Memorandum of Points and Authorities in
3 Support of Motion for an Order to Submit Certain Documents Under Seal (Doc. No. 277) and the
4 Court's July 16, 2012 Order granting that motion (Doc. No. 280). Briefly, the Court's
5 Protective Order of April 21, 2010 (Doc. No. 67) generally prohibits the disclosure of
6 confidential materials and provides that a party who wishes to file confidential information under
7 seal must first seek permission from the Court under Civil Local Rule 79.2.

8 **ARGUMENT**

9 Plaintiffs move to file under seal the following documents:

10 Plaintiffs' Response Brief Regarding Damages Discovery Pursuant to Magistrate Judge
11 Dembin's July 6, 2012 Order ("Plaintiffs' Response Brief").

12 Plaintiffs' Response Brief contains information contemplated by the Court's July 16,
13 2012 Order, which is confidential to Plaintiffs.

14 **CONCLUSION**

15 For the foregoing reasons, Plaintiffs respectfully request that the Court issue an order
16 permitting Plaintiffs to file under seal Plaintiffs' Response Brief.

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Respectfully submitted,

By: /s/ John van Loben Sels

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